

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL NO. 09-117
v.	*	SECTION: K
RHONDA D. WILLIAMS	*	VIOLATION: 18 U.S.C. § 287

* * *

FACTUAL BASIS

Should this matter have gone to trial, the United States would have proven beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits including the testimony of special agents of the Federal Bureau of Investigation (“FBI”), representatives of the Federal Emergency Management Agency (“FEMA”), and others, the following facts to support the allegations charged by the United States Attorney in Count 1 of the Indictment now pending against the defendant, **RHONDA D. WILLIAMS**.

First, the United States would present evidence in the form of documents and testimony that FEMA is an agency of the United State of America.

Second, the United States would offer FEMA documents and the testimony of a FEMA representative showing that from on or about September 9, 2005 through on or about January 12, 2006 the defendant, **RHONDA D. WILLIAMS**, intentionally made the following false and fraudulent statements to FEMA and a FEMA representative when she applied for FEMA assistance: (1) that she resided at 3423 Kent Avenue, Apartment 3, Metairie, Louisiana (“Apartment 3”) on August 29, 2005, the date that Hurricane Katrina made landfall in Southeastern Louisiana; (2) that Apartment 3 suffered damage caused by Hurricane Katrina; (3) that Apartment 3 was located on the first-floor of the apartment complex located at 3432 Kent Avenue, and (4) that Apartment 3 suffered damage, including flood damage, as a result of Hurricane Katrina. A FEMA representative would be called testify that these statements were material to FEMA’s decision to award the defendant rental and other assistance and, in fact, caused FEMA to award the defendant, **RHONDA D. WILLIAMS**, assistance in the amount of \$18,223.51.

Admissible exhibits and testimony of the property manager at 3423 Kent Avenue, Apartment 3, Metairie, Louisiana would be introduced to show that **RHONDA D. WILLIAMS** lived in Apartment 3 prior to August 2005, but was evicted prior to August 15, 2005 for non-payment of rent. Documents and testimony of the property manager and the owner of the apartment building located

at 3423 Kent Avenue would be introduced to show that Apartment 3 was located on the second floor of the building, not the first floor, and was not damaged by flood water or otherwise as a result of Hurricane Katrina.

READ AND APPROVED:

CINTHIA CIMINO (Date)
Counsel for RHONDA D. WILLIAMS

SHARAN E. LIEBERMAN (Date)
Assistant U.S. Attorney

RHONDA D. WILLIAMS (Date)
Defendant